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March 13, 2020

Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 3-13-20Re: *United States v. Joseph Perlman*, 19-cr-531 (ALC)

Dear Judge Carter:

I represent Joseph Perlman in the above-captioned case and write with the consent of the Government to request a thirty-day extension of Mr. Perlman's date of surrender, which is currently set for Monday, March 16, 2020, seven days after Mr. Perlman received notice of his designation to FCP Montgomery.

Procedural History

We appeared before your honor for a sentencing hearing in this case on Friday, December 6, 2019. At that hearing, Your Honor ordered that Mr. Perlman surrender to the United States Marshal for the Southern District of New York at 10:00 am on February 7, 2020, if he had not yet received his designation from the Bureau of Prisons. On February 4, 2020, Your Honor granted Mr. Perlman's request for an extension of time to surrender until the earlier of (1) Sunday, March 8, 2020 or (2) five days after he received his designation from the Bureau of Prisons, as he had not yet been designated. On March 4, 2020, as Mr. Perlman still had not received his designation from the Bureau of Prisons, Your Honor granted Mr. Perlman's request for an additional extension of time to surrender until seven days after he received his designation. Mr. Perlman never received his designation by mail, but I informed him of his designation to FCP Montgomery after learning of it from the government on Monday, March 9, 2020.

Request for Extension of Time to Surrender

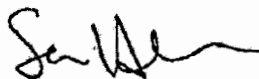
In the past two weeks, Mr. Perlman has experienced [REDACTED]
a condition he has experienced previously. [REDACTED]

[REDACTED] In light of Mr. Perlman's ongoing health concerns, we, with the consent of the government, ask Your Honor to grant Mr. Perlman a thirty-day extension – until Wednesday, April 15, 2020 – to surrender at FCP Montgomery.

Moreover, although the government does not consent on this basis, we note that an additional basis for granting a thirty-day extension relates to the COVID-19 outbreak, which is

particularly dangerous to individuals like Mr. Perlman who, pursuant to guidance issued by the Centers for Disease Control and Prevention, are at higher risk of contracting the virus [REDACTED] [REDACTED], and who would be at greater risk of doing so while in close proximity to others at a federal correctional facility.

Respectfully submitted,



Sean Hecker

cc: (by email)

David Abramowicz and Michael McGinnis
Assistant United States Attorneys, Southern District of New York

Application granted. Mr. Perlman shall surrender
on April 16, 2020.

So Ordered.

3-13-20